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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. IRMA E. GONZALEZ)

| | | |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, |) | Crim. Case No. 12CR0236-IEG |
| Plaintiff, |) | |
| v. |) | NOTICE OF MOTION AND MOTION |
| |) | TO SUPPRESS CELL SITE AND |
| |) | SIMULATED CELL SITE EVIDENCE; |
| |) | COMPEL DISCOVERY; AND GRANT |
| |) | LEAVE TO FILE ADDITIONAL |
| |) | MOTIONS TO SUPPRESS WIRE |
| |) | AND ELECTRONIC INTERCEPTION |
| |) | EVIDENCE |
| MIGUEL GRADO, |) | |
| Defendant. |) | NCD: April 19, 2013 |
| |) | at 10:30 a.m. |

TO: LAURA E. DUFFY, UNITED STATES ATTORNEY
FRED SHEPPARD, ASSISTANT UNITED STATES ATTORNEY, and
TARA McGRATH, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on Friday, April 19, 2013, at 10:30 a.m., or as soon before or thereafter as counsel may be heard, the defendant, MIGUEL GRADO, through his appointed counsel, Debra DiIorio, will bring the following motions.

MOTION

The defendant, MIGUEL GRADO, by and through his appointed counsel, Debra DiIorio, and pursuant to the provisions of Rules 12 and 16 of the Federal Rules of Criminal Procedure, and the Fourth, Fifth and Sixth Amendments to the United

1 States' Constitution, hereby moves this Court to suppress cell site and simulated cell
2 site evidence; compel discovery, and grant leave to file additional motions to
3 suppress wire and electronic interception evidence.

4 This motion is based upon the instant motion and notice of motion, the attached
5 statement of facts and points and authorities in support of this motion, and, any and
6 all matters that may come to the Court's attention prior to or at the time of the hearing
7 of this motion.

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9 Respectfully submitted,

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11 Dated: April 8, 2013

/s/ Debra DiIorio
12 DEBRA DI IORIO
Attorney for Defendant MIGUEL GRADO
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